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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. 2009-203

12 **LISA ANNE GOLDSBURY CHISHOLM, AKA**
13 **LISA ANNE GOLDSBURY, AKA**
LISA ANNE CHISHOLM
6128 Calle Arena
14 Camarillo, California 93012

ACCUSATION

15 Registered Nurse License No. 511746

16 Respondent.

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18 Ruth Ann Terry, M.P.H., R.N. ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the
21 Executive Officer of the Board of Registered Nursing ("Board") Department of Consumer
22 Affairs.

23 **Registered Nurse License**

24 2. On or about May 31, 1995, the Board issued Registered Nurse License
25 Number 511746 to Lisa Anne Goldsbury Chisholm, also known as Lisa Anne Goldsbury and
26 Lisa Anne Chisholm ("Respondent"). The registered nurse license expired on February 28, 2009.

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8. Code section 2762 states, in pertinent part:

In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(b) Use any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to himself or herself, any other person, or the public or to the extent that such use impairs his or her ability to conduct with safety to the public the practice authorized by his or her license.

(c) Be convicted of a criminal offense involving the prescription, consumption, or self-administration of any of the substances described in subdivisions (a) and (b) of this section, or the possession of, or falsification of a record pertaining to, the substances described in subdivision (a) of this section, in which event the record of the conviction is conclusive evidence thereof.

COST RECOVERY

9. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

FIRST CAUSE FOR DISCIPLINE

(Criminal Convictions)

10. Respondent is subject to disciplinary action under Code sections 2761, subdivision (f) and 490, in that Respondent has been convicted of the following crimes that are substantially related to the qualifications, functions, and duties of a licensed registered nurse:

a. On April 1, 2005, in the Superior Court, County of Ventura, California, in the matter entitled *People vs. Lisa Anne Chisholm* (2005, Case No. 2004020663), Respondent was convicted on her plea of nolo contendere of violating Vehicle Code section 23152, subdivision (a) (driving under the influence of alcohol or drugs), a misdemeanor. The circumstances of the crime are, that on or about May 23, 2004, Respondent was arrested after she was observed by two witnesses to be driving erratically and on the wrong side of the road.

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1 b. On October 3, 2006, in the Superior Court, County of Ventura, California,
2 in the matter entitled *People vs. Lisa Anne Chisholm* (2006, Case No. 2006006982), Respondent
3 was convicted on her plea of nolo contendere of violating Vehicle Code section 23152,
4 subdivision (a) (driving under the influence of alcohol or drugs), a felony. The circumstances of
5 the crime are that on or about November 30, 2005, Respondent drove a vehicle while under the
6 influence of drugs, resulting in a collision with another vehicle, causing injury to Respondent and
7 the other driver.

8 c. On May 23, 2007, in the Superior Court, County of Ventura, California, in
9 the matter entitled *People vs. Lisa Anne Chisholm* (2007, Case No. 2007016436), Respondent
10 was convicted on her plea of guilty of violating Vehicle Code section 12500, subdivision (a)
11 (unlicensed driver), a misdemeanor. The circumstances of the crime are that on or about
12 April 25, 2007, Respondent was arrested for driving a vehicle without a valid driver's license.

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14 **SECOND CAUSE FOR DISCIPLINE**

15 **(Conviction of a Crime Involving Alcoholic Beverages and or Drugs)**

16 11. Respondent is subject to discipline under Code section 2761, subdivision
17 (a), on the grounds of unprofessional conduct, as defined in Code section 2762, subdivision (c),
18 in that Respondent has been convicted of a crime involving alcoholic beverages, as more
19 particularly set forth in paragraph 10, above.

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21 **THIRD CAUSE FOR DISCIPLINE**

22 **(Use Alcoholic Beverages to an Extent or in a Manner Dangerous or Injurious)**

23 12. Respondent is subject to discipline under Code section 2761, subdivision
24 (a) on the grounds of unprofessional conduct as defined in Code section 2762, subdivision (b), in
25 that on or about April 4, 2004, Respondent used alcoholic beverages to an extent, or in a manner
26 dangerous or injurious to herself.

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PRAYER


WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 511746, issued to Lisa Anne Goldsbury Chisholm, also known as Lisa Anne Goldsbury and Lisa Anne Chisholm;

2. Ordering Lisa Anne Goldsbury Chisholm, also known as Lisa Anne Goldsbury and Lisa Anne Chisholm to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Code section 125.3; and,

3. Taking such other and further action as deemed necessary and proper.

DATED: 3/23/09


RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant